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VIA ECF July 20, 2023

Honorable Christine P. O'Hearn, U.S.D.J. Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets, Courtroom 5A Camden, NJ 08101

Re: Brian McBride, et al. v. NJ Pen

Civil Action No. 1:23-cv-02044-CPO-AMD

Settlement Conference

Dear Judge O'Hearn:

This letter is submitted per the Court's Order of July 10, 2023 (ECF No. 41), which instructed counsel for NJ Pen Media Group, LLC ("NJ Pen") to notify the Court as to whether NJ Pen believes further settlement discussions consistent with the offer conveyed by the Court would be productive.

Following the Show Cause Hearing, Plaintiffs by e-mail made additional demands that altered the settlement terms conveyed at the hearing, which has created some uncertainty as to the purported terms and thus the ability of NJ Pen to assess the likelihood of reaching a settlement. Nevertheless, NJ Pen is willing to participate in good faith in a settlement conference with Your Honor to explore potential resolution of this matter on mutually agreeable terms.

Should the Court require additional information, please do not hesitate to contact me. Thank you.

Respectfully,

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By: <u>Christopher M. Terlingo</u>
Christopher Terlingo

cc: Brian F. McBride (via e-mail) Deborah Blissick (via e-mail)